

**EXHIBIT 6**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO, LLC, )  
Plaintiffs, )  
- vs - ) Case No.  
UBER TECHNOLOGIES, INC., ) 3:17-cv-00939  
OTTOMOTTO LLC; OTTO )  
TRUCKING, LLC, )  
Defendants. )

---

VIDEOTAPED DEPOSITION OF JOHN BARES,  
a witness, called by the Plaintiff for examination,  
in accordance with the Federal Rules of Civil  
Procedure, taken by and before Tammie Elias, RPR and  
Notary Public in and for the Commonwealth of  
Pennsylvania, at the office of Reed Smith, 225 Fifth  
Avenue, Suite 1200, Pittsburgh, Pennsylvania, on  
Friday, June 16, 2017, commencing at 9:05 a.m.

JOB No. 2640097

PAGES 1 - 317

1 APPEARANCES:

3 FOR THE PLAINTIFF:

4 By: James D. Judah, Esq.

5 jamesjudah@quinnenamuel.com

6 QUINN EMANUEL  
7 50 California Street  
8 22nd Floor

9 San Francisco, CA 94111  
415-875-6600 p  
415-875-6700 f

11 FOR THE DEFENDANTS:

12 By: Michael Brille, Esq.  
mbrille@bsfllp.com

13 Cain Norris, Esq.  
cnorris@bsfllp.com  
14 BOIES SCHILLER FLEXNER, LLP  
15 1401 New York Avenue NW  
Washington, DC 20005  
202-237-2727

17 By: Michelle Yang, Esq.  
myang@mofo.com  
18 MORRISON FOERSTER  
2000 Pennsylvania Avenue, NW  
19 Suite 6000  
Washington, DC 20006  
20 202-887-1537 p  
202-887-0763 f

22 By: Aaron Bergstrom, Esq.  
abergstrom@uber.com  
23 UBER  
415-533-7652

24 ALSO PRESENT:

25 Matthew Rethage, Videographer

1	Uber, what was his title?	09:21a
2	A. I don't know.	09:21a
3	Q. When did Mr. Levandowski start working for	09:21a
4	Uber?	09:21a
5	A. Can you clarify in what capacity?	09:21a
6	Q. Well, let's start with the earliest date	09:21a
7	Mr. Levandowski started working for Uber in	09:21a
8	any capacity?	09:22a
9	A. So to my knowledge it would have been early	09:22a
10	May, late April to early May 2016, when he was	09:22a
11	consulting for the company.	09:22a
12	Q. And how long was Mr. Levandowski consulting	09:22a
13	for the company?	09:22a
14	A. I believe from that period up through August	09:22a
15	18th plus or minus a few days when Uber	09:22a
16	acquired his company and therefore he became	09:22a
17	an employee.	09:22a
18	Q. What was Mr. Levandowski's title when he	09:22a
19	became an Uber employee?	09:22a
20	A. I don't know.	09:22a
21	Q. Have you ever heard of Mr. Levandowski	09:22a
22	referred to as Uber's vice president of	09:22a
23	engineering?	09:22a
24	A. Yes.	09:22a
25	Q. Was that his title at some point?	09:22a

1	week of May, yes, May of 2017.	09:24a
2	BY MR. JUDAH:	09:24a
3	Q. You referred earlier to consulting work	09:24a
4	Mr. Levandowski did starting in late April,	09:24a
5	early May 2016; is that correct?	09:24a
6	A. Correct.	09:24a
7	Q. Before that time, had Mr. Levandowski done any	09:24a
8	work for Uber?	09:25a
9	A. Not that I'm aware of.	09:25a
10	Q. Can you elaborate on the consulting work	09:25a
11	Mr. Levandowski did between late April, early	09:25a
12	May and August 2016?	09:25a
13	A. It was quite comprehensive. He would -- in	09:25a
14	his role he examined everything we were doing,	09:25a
15	from sensors to automotive OEM partners to	09:25a
16	software design, to mapping, to labeling,	09:25a
17	everything in the self-driving effort.	09:25a
18	Reviewed all of those pieces, gave comments	09:25a
19	and suggested, suggested change of direction,	09:25a
20	paths forward, how to improve what we were	09:25a
21	doing and gain higher speed.	09:26a
22	Q. Was Mr. Levandowski's consulting work, that	09:26a
23	included Lidar; correct?	09:26a
24	A. Yes. Yes, it did. [REDACTED]	09:26a
25	[REDACTED]	09:26a

1	2016?	11:10a
2	A. I was director and founder of ATC.	11:10a
3	Q. So between January 2015 and roughly June 2016	11:10a
4	--	11:11a
5	A. Correct.	11:11a
6	Q. -- you were director and founder of ATC?	11:11a
7	A. Correct.	11:11a
8	Q. What were your responsibilities in that	11:11a
9	capacity?	11:11a
10	A. Well, to put it in context, ATC at that time	11:11a
11	of decision by Travis, myself, Jeff Holden,	11:11a
12	that ATC would be what I think of as a	11:11a
13	semi-autonomous unit, autonomous not related	11:11a
14	to car technology. A very separate unit from	11:11a
15	the main Uber company, so my responsibilities	11:11a
16	were everything. We did our own real estate,	11:11a
17	we did our own recruiting, staffing, hiring.	11:11a
18	Virtually much like a startup company, though	11:11a
19	obviously we didn't have to fundraise, but	11:11a
20	responsibilities covered everything from real	11:11a
21	estate to technical design reviews.	11:11a
22	Q. Did Uber have any footprint in Pittsburgh	11:11a
23	before the founding of ATC?	11:11a
24	A. No. Other than Uber service, car service.	11:11a
25	Q. So I take it that the number of people	11:12a

1 COMMONWEALTH OF PENNSYLVANIA) CERTIFICATE  
2 COUNTY OF INDIANA ) SS:

3 I, Tammie Elias, RPR and Notary Public in and  
4 for the Commonwealth of Pennsylvania, do hereby  
5 certify that the witness, JOHN BARES, was by me  
6 first duly sworn to testify to the truth; that the  
7 foregoing deposition was taken at the time and place  
8 stated herein; and that the said deposition was  
9 recorded stenographically by me and then reduced to  
10 printing under my direction, and constitutes a true  
11 record of the testimony given by said witness.

12 I further certify that the inspection, reading  
13 and signing of said deposition were NOT waived by  
14 counsel for the respective parties and by the  
15 witness.

16 I further certify that I am not a relative or  
17 employee of any of the parties, or a relative or  
18 employee of either counsel, and that I am in no way  
19 interested directly or indirectly in this action.

20 IN WITNESS WHEREOF, I have hereunto set my  
21 hand and affixed my seal of office this 19th day of  
22 June, 2017.

23

24 <%signature%>

25 \_\_\_\_\_  
Notary Public